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12 IN THE UNITED STATES DISTRICT COURT
13
FOR THE NORTHERN DISTRICT OF CALIFORNIA
14
SAN FRANCISCO DIVISION

16 UNITED STATES,

Case No. CR-21-00162-WHO

17 Plaintiff,

**STIPULATION TO CONTINUE
STATUS CONFERENCE FROM MAY
8, 2025 AT 1:30 P.M., TO JULY 31,
2025 at 1:30 P.M. AND EXCLUDE
TIME UNDER THE SPEEDY TRIAL
ACT; AND [PROPOSED] ORDER**

18 v.

19 BABAK BROUMAND AND
20 MALAMATENIA MAVROMATIS,

21 Defendants.

24 STIPULATION

25 The parties hereby stipulate that the currently set status conference be continued from
26 May 8, 2025, at 1:30 p.m. to July 31, 2025, at 1:30 p.m.
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STIPULATION AND [PROPOSED] ORDER
United States v. Broumand, et al;
Case No. CR-21-00162-WHO

1 1. Defendant BABAK BROUMAND is in custody of the Bureau of Prisons in
2 Alabama after being convicted at jury trial in the related case of *United States v. Broumand*, 20-
3 224-RGK(A).

4 2. The government has produced over 60,000 pages of discovery to defendant
5 MAVROMATIS, which primarily consists of business records, including bank, credit card,
6 mortgage broker, title company, and escrow company records, tax returns, and witness
7 interview reports.

8 3. On March 24, 2022, the government obtained a superseding indictment in this
9 case adding defendant MAVROMATIS, who first appeared in this case on April 19, 2022, in
10 which she was charged with two counts of False Statements on a Loan Application in
11 violation of 18 U.S.C. § 1014 (Counts Four and Six). Prior to defendant MAVROMATIS's
12 indictment, co-defendant BABAK BROUMAND had already been charged.

13 4. The parties have reached an agreement on a proposed resolution and need
14 additional time to document their agreement for the Court's consideration. Accordingly, in
15 addition to the reasons outline below, the government and defense counsel agree that time is
16 excludable because of the Court's "consideration...of [the] proposed plea agreement to be
17 entered into by the [parties]." 18 U.S.C. § 3161(h)(1)(G). The government will file the plea
18 agreement, and diversion paperwork, well in advance of the July 31, 2025 hearing.

19 6. Therefore, the parties stipulate and agree that excluding time until July 31, 2025,
20 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The
21 parties further stipulate and agree that the ends of justice served by excluding the time from
22 May 8, 2025, through July 31, 2025 from computation under the Speedy Trial Act outweigh
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the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

7. Accordingly, the parties ask that the Court to continue the status conference to July 31, 2025, and that the Court convert the status conference to a Change of Plea hearing once the government files the plea agreement.

8. The undersigned Assistant United States Attorneys certify that they have obtained approval from all counsel to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: May 6, 2025

/s/ Juan M. Rodriguez
MICHAEL J. MORSE
JUAN M. RODRIGUEZ
Special Assistant United States Attorney

DATED: May 6, 2025

/s/ Steven F. Gruel
STEVEN F. GRUEL
Counsel for Defendant BROUMAND

DATED: May 6, 2025

/s/ Paul H. Nathan
PAUL H. NATHAN
Counsel for Defendant MAVROMATIS
D1 ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court hereby continues the status conference from May 8, 2025, at 1:30 p.m. to August 7, 2025 at 1:30 p.m.

Furthermore, the Court finds that failing to exclude the time from May 8, 2025, through August 7, 2025, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

STIPULATION AND [PROPOSED] ORDER
United States v. Broumand, et al;
Case No. CR-21-00162-WHO

The Court further finds that the ends of justice served by excluding the time from May 8, 2025, through August 7, 2025, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial. Therefore, and with the consent of the parties,

IT IS HEREBY ORDERED that the time from May 8, 2025, to August 7, 2025, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §§ 3161(h)(1)(G), (h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: May 6, 2025

K. H. Ae

HONORABLE WILLIAM H. ORRICK
United States District Court

STIPULATION AND [PROPOSED] ORDER
United States v. Broumand, et al;
Case No. CR-21-00162-WHO